

1 Vanessa R. Waldref
2 United States Attorney
2 Eastern District of Washington
3 Stephanie Van Marter
3 Caitlin Baunsgard
4 Assistant United States Attorneys
4 Post Office Box 1494
5 Spokane, WA 99210-1494
5 Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Dec 05, 2023

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

5

Case No.: 4:23-CR-6027-SAB

SUPERSEDING INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(ii), 846
Conspiracy to Distribute 5
Kilograms or More of Cocaine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(ii)
Possession with the Intent to
Distribute 500 Grams or More
of Cocaine
(Count 2)

18 U.S.C. §§ 922(g)(5)
(A), 924(a)(8)
Alien in Possession of a
Firearm
(Count 3)

21 U.S.C. § 853, 18
U.S.C. § 924(d)(1), 28
U.S.C. § 2461(c)
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3 Beginning on a date unknown, but by January 2022, and continuing until on
4 or about September 14, 2023, in the Eastern District of Washington and elsewhere,
5 the Defendants, [REDACTED] JUAN
6 CARDENAS VALDOVINOS (a/k/a "Duvalin"), JOSE CARLOS MENDOZA
7 SANCHEZ (a/k/a "Carteezy"), and ROBERTO VALENCIA VALDEZ, and other
8 individuals, both known and unknown to the Grand Jury, did knowingly and
9 intentionally combine, conspire, confederate and agree together with each other to
10 commit the following offense: Distribution of 5 kilograms or more of a mixture or
11 substance containing a detectable amount of cocaine, a Schedule II controlled
12 substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii), 846.

13 COUNT 2

14 On or about August 3, 2023, in the Eastern District of Washington, the
15 Defendant, [REDACTED] did knowingly
16 possess with intent to distribute 500 grams or more of a mixture or substance
17 containing a detectable amount of cocaine, a Schedule II controlled substance, in
18 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii).

19 COUNT 3

20 On or about August 18, 2023, in the Eastern District of Washington, the
21 Defendant, JOSE CARLOS MENDOZA SANCHEZ (a/k/a "Carteezy"), knowing

1 that he was an alien illegally and unlawfully in the United States did knowingly
2 possess a firearm, that is, a Glock 19 9mm handgun bearing serial number
3 ABPP961, which firearm had theretofore been shipped and transported in interstate
4 and foreign commerce; in violation of 18 U.S.C. §§ 922(g)(5), 924(a)(8).

5 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

6 The allegations set forth in this Superseding Indictment are hereby realleged
7 and incorporated by reference for the purpose of alleging forfeitures.

8 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of
9 21 U.S.C. § 841, as set forth in this Superseding Indictment, Defendants, [REDACTED]

10 [REDACTED], JUAN CARDENAS
11 VALDOVINOS (a/k/a "Duvalin"), JOSE CARLOS MENDOZA SANCHEZ (a/k/a
12 "Carteezy"), and ROBERTO VALENCIA VALDEZ shall forfeit to the United
13 States of America, any property constituting, or derived from, any proceeds
14 obtained, directly or indirectly, as the result of such offense(s) and any property
15 used or intended to be used, in any manner or part, to commit or to facilitate the
16 commission of the offense.

17 The assets to be forfeited include, but are not limited to:

18 Defendant [REDACTED] (Counts 1
19 and 2)

20 - \$44,000.00 U.S. currency seized on or about August 3, 2023; and,
21 - \$9,773.00 U.S. currency seized on or about September 7, 2023.

1 Defendant JUAN CARDENAS VALDOVINOS (a/k/a "Duvalin") (Count 1)

2 - \$12,400.00 U.S. currency seized on or about September 7, 2023;

3 - Eagle Arms, Model Eagle-15, bearing serial number M22-14674, a
4 loaded magazine and two (2) empty magazines;

5 - a .22 Cricket rifle, bearing serial number 156694, with scope, strap and
6 light and loaded twelve (12) rounds of ammunition;

7 - an Interarms .22 caliber rifle, Model #22 ATD, bearing serial number
8 203750;

9 - one (1) box of American Eagle .380 auto ammunition; and,

10 - one (1) box of Sig Sauer .380 auto ammunition.

10 If any forfeitable property, as a result of any act or omission of the
11 Defendants:

12 a. cannot be located upon the exercise of due diligence;

13 b. has been transferred or sold to, or deposited with, a third party;

14 c. has been placed beyond the jurisdiction of the court;

15 d. has been substantially diminished in value; or

16 e. has been commingled with other property which cannot be
17 divided without difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property
19 pursuant to 21 U.S.C. § 853(p).

20 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
21 of an offense in violation of 18 U.S.C. §§ 922(g)(5), (A), 924(a)(8), Alien in

1 Possession of a Firearm, as set forth in Count 3 of this Superseding Indictment, the
2 Defendant, JOSE CARLOS MENDOZA SANCHEZ (a/k/a “Carteezy”), shall
3 forfeit to the United States of America, any firearms and ammunition involved or
4 used in the commission of the offense, including, but not limited to:

5 - a Glock 19 9mm handgun bearing serial number ABPP961

6 DATED this _____ day of December 2023.

7 A TRUE BILL

8

9

10 Foreperson

11 _____
12 Vanessa R. Waldref
United States Attorney

13 _____
14 Stephanie Van Marter
Assistant United States Attorney

15 
16 _____
17 Caitlin Baunsgard
Assistant United States Attorney